

ORASURE TECHNOLOGIES, INC.
ANTI-CORRUPTION POLICY
NOVEMBER 12, 2018

1. Introduction.

Combating Corruption. OraSure Technologies, Inc., including its subsidiaries and affiliates (collectively, “Company”), operates in a wide range of legal and business environments, many of which pose challenges to our ability to conduct our business operations with integrity. As a company, we strive to conduct ourselves according to the highest standards of ethical conduct. Throughout its operations, the Company seeks to avoid even the appearance of impropriety in the actions of its directors, officers, employees, agents, and other Company Representatives (defined below).

Accordingly, this Anti-Corruption Policy (“Policy”) reiterates our commitment to integrity, and explains the specific requirements and prohibitions applicable to our operations under anti-corruption laws, including, but not limited to, the US Foreign Corrupt Practices Act of 1977 (“FCPA”). This Policy contains information intended to prevent corruption and bribery from occurring in the Company’s activities. The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur in its business activities.

The Company’s Board of Directors (the “Board of Directors” or “Board”) is ultimately responsible for the implementation of this Policy. The Board has designated the Company’s General Counsel to be the compliance officer (the “Compliance Officer”) for the implementation, interpretation and administration of this Policy, including periodically reviewing this Policy and proposing any changes to this Policy that are deemed necessary or appropriate.

Under the FCPA, it is illegal for US persons (including US companies or any companies traded on US exchanges, and their Company Personnel and Company Representatives (as such terms are defined below)) to bribe non-US government officials. The concept of prohibiting bribery is simple. However, understanding the full scope of the FCPA is essential as this law directly affects everyday business interactions between the Company and non-US governments and government-owned or government-controlled entities.

Violations of the FCPA can also result in violations of other US laws, including anti-money laundering, mail and wire fraud, and conspiracy laws. The penalties for violating the FCPA are severe. In addition to being subject to the Company’s disciplinary policies (including termination), individuals who violate the FCPA may also be subject to imprisonment and fines.

Aside from the FCPA, the Company may also be subject to other, possibly more strict, non-US anti-corruption laws, in addition to the local laws of the countries in which the Company conducts business. This Policy generally sets forth the expectations and requirements for compliance with those laws as well.

Applicability. This Policy is applicable to all of the Company’s operations worldwide. This Policy applies to:

- all of the Company’s directors, officers, and employees (collectively, “Company Personnel”).

- the Company's agents, consultants, joint venture partners, and any other third-party representatives that, on behalf of the Company, have conducted business outside of the US or interacted with non-US government officials or are likely to conduct business outside of the US or interact with non-US government officials (collectively, "Company Representatives").

Please note that this Policy applies in addition to (not in lieu of) the Company's other applicable policies and codes, including, but not limited to, the Company's Code of Business Conduct and Ethics.

2. Prohibited Payments.

Company Personnel and Company Representatives are prohibited from directly or indirectly making, promising, authorizing, or offering "anything of value" (defined below) to a non-US government official on behalf of the Company to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to third-parties where the Company Personnel and Company Representatives knows, or has reason to know, that the third-party will use any part of the payment for bribes. Company Personnel and Company Representatives are also prohibited from accepting any bribes.

(a) **Cash and Non-Cash Payments: "Anything of Value."** Payments that violate the FCPA may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. The FCPA prohibits giving "anything of value" for an improper purpose. This term is very broad and can include, for example:

- (i) Gifts and gift cards.
- (ii) Travel, meals, lodging, entertainment, or gift cards.
- (iii) Loans or non-arm's length transactions.
- (iv) Charitable donations and sponsorships or political donations.
- (v) Business, employment, or investment opportunities.
- (vi) Facilitation payments.
- (vii) Solicitation and extortion.

(b) **Non-US Government Official.** The FCPA broadly defines the term non-US government official to include:

- (i) Officers or employees of a non-US government or any department, agency, or instrumentality thereof.
- (ii) Officers or employees of a company or business owned in whole or in part by a non-US government (a state owned or controlled enterprises).
- (iii) Officers or employees of a public international organization (such as the United Nations,

World Bank, or the European Union).

(iv) Non-US political parties or officials thereof.

(v) Candidates for non-US political office.

This term also includes anyone acting on behalf of the above including, but not limited to, the spouse, children and other immediate family members of a foreign government official.

On occasion, a non-US government official may attempt to solicit or extort improper payments or anything of value from Company employees or agents. Such employees or agents must inform the non-US government official that the Company does not engage in such conduct and immediately contact the Company's Compliance Officer or the Associate General Counsel.

(c) **Commercial Bribery.** Bribery involving commercial (non-governmental parties) is also prohibited under this Policy and the Company's Code of Business Conduct and Ethics. To this end, Company employees and agents shall not offer, promise, authorize the payment of, or pay or provide anything of value to any employee, agent, or representative of another company to induce or reward the improper performance of any function or any business-related activity. Company employees and agents also shall not request, agree to receive, or accept anything of value from any employee, agent, or representative of another company or entity as an inducement or reward for the improper performance of any function or business-related activity.

3. Permitted Payments.

The FCPA does not prohibit all payments to non-US government officials. In general, the FCPA permits three categories of payments discussed below. **Please note that while these payments might be permitted, to ensure legal compliance, all payments listed below must be pre-approved by the Compliance Officer and properly recorded in the Company's books and records.**

(a) **Facilitating Payments.** The FCPA includes an exception for nominal payments made to low-level government officials to ensure or speed the proper performance of a government official's routine, non-discretionary duties or actions, such as:

(i) Clearing customs.

(ii) Processing governmental papers such as visas, permits, or licenses.

(iii) Providing police protection.

(iv) Providing mail, telephone, or utility services.

Facilitating payments should be avoided to the maximum extent possible. Where it is not possible to avoid a facilitating payment, payments of a nominal value (i.e., up to US\$100) might be permitted after pre-approval from the Compliance Officer.

(b) **Promotional Hospitality and Marketing Expenses or Pursuant to a Contract.** The

Company may pay for the reasonable cost of a non-US government official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration, or explanation of Company products or services, or the execution of a contract with a non-US government or agency. Particular care must be taken when paying any such costs associated with a non-US government official to ensure it is clear that such payments are not intended, and cannot be perceived as being intended, to influence the government official in the exercise of his or her public functions. The principal guide in providing entertainment/hospitality is a rule of reasonableness. The Company should be cautious and conservative, and ensure that such expenditures conform to generally-accepted local custom and are permitted under local law and the recipient's organizational guidelines. Company Personnel must not provide any gifts or business entertainment/hospitality that is excessive in nature or frequency, prohibited under local law, or otherwise inappropriate to any person, including Government Officials. Any hospitality or entertainment expenses involving non-US government officials require pre-approval from the Compliance Officer.

(c) **Promotional Gifts.** Promotional gifts of nominal value (i.e., up to US\$100) may be given to a non-US government official as a courtesy in recognition of services rendered or to promote goodwill. These gifts must be nominal in value and should generally bear the trademark of the Company or one of its products. Gifts of cash or of substantial value, even if customary in the country at issue, generally will not be permitted. Providing any gift to a non-US government official requires pre-approval from the Compliance Officer.

4. Political and Charitable Contributions.

Contributions to candidates for non-US political office on behalf of the Company are prohibited unless the Compliance Officer pre-approves them in writing. Charitable contributions to non-US charities on behalf of the Company must also be pre-approved in writing by the Compliance Officer.

Company Personnel generally are not precluded from making personal charitable donations or political contributions allowable by law, whether in the United States or abroad, though the Company will not pay or reimburse for such payments. Any such payments should be made in such a way as make clear to any outside observer that they are purely personal, and are unrelated to any business of the Company. However, any Company Personnel who may solicit business from non-US government officials or otherwise interact with non-US government officials must receive prior approval from the Compliance Officer before making any personal charitable donations or political contributions outside of the United States to avoid potential perceptions that such donations or contributions are related to the Company's business.

5. Record Keeping.

It is the Company's policy to implement and maintain internal accounting controls based upon sound accounting principles. All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions. These accounting entries and the supporting documentation must be periodically reviewed to identify and correct discrepancies, errors, and omissions.

(a) **Authorization for Transactions.** All transactions involving the provision of anything of value to a non-US government official must occur only with appropriate Company authorization.

(b) **Recording Transactions.** All transactions involving the provision of anything of value to a non-US government official must be recorded in accordance with generally accepted accounting principles.

(c) **Tracking Transactions.** All transactions involving the provision of anything of value to a non-US government official must be tracked in a separate log or record, with supporting documentation identifying:

- (i) The name and position of the employee requesting and authorizing the transaction.
- (ii) The name and position of the non-US government official involved in the transaction.
- (iii) A description, including the value, of the payment or provision of anything of value, and where applicable, a description of the Company's products or services being promoted or the relevant contractual provision if the payment was made pursuant to a contract.

6. Cash Payments.

Cash payments of any kind to a third-party, other than documented petty cash disbursements or other valid and approved payments, are strictly prohibited. Company checks shall not be written to "cash", "bearer", or anyone other than the party entitled to payment except to replenish properly used petty cash funds.

7. Representatives.

The Company might be held liable for actions of Company Representatives acting on the Company's behalf. Therefore, all Company Representatives must fully comply with the FCPA and all other applicable laws and may not engage in activities that the Company or Company Personnel may not do directly.

Each of the Company Representatives as well as any other third-party representatives that have or are likely to have contact with foreign governments officials on the Company's behalf, must:

- Certify or represent that it complies with the FCPA, other relevant anti-bribery laws and this Policy;
- Commit in its contract with the Company to comply with the FCPA, other relevant anti-bribery laws and this Policy; and
- Not allow work to be subcontracted to another party without the Company's written approval.

Where appropriate, the Company may take certain steps to ensure compliance with this Policy and applicable laws by Company Representatives, which may include conducting pre-retention due diligence of potential Company Representatives and monitoring the activities of Company Representatives when acting on behalf the Company to ensure compliance with this Policy and applicable laws.

8. Duty to Comply.

Company Personnel and Company Representatives must be familiar with and perform their duties according to the requirements set out in this Policy. Company employees or agents who violate this Policy are subject to disciplinary action, up to and including dismissal. Third-party representatives who violate this Policy may be subject to termination of all commercial relationships with the Company.

To ensure that all Company employees and agents are thoroughly familiar with the provisions of this Policy, the FCPA, and any other applicable anti-corruption laws, the Company shall provide anti-corruption training and resources to those Company employees and agents, as appropriate.

Any Company employee or agent who suspects that this Policy may have been violated must immediately notify the Company as specified in the section entitled "Reporting Policy Violations" below. Any Company employee who, in good faith, reports suspected legal, ethical, or Policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance from the Compliance Officer or Associate General Counsel before taking any action that may subject the Company to potential FCPA liability.

9. Duty to Cooperate.

The Company may at times undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all employees, agents, and third-party representatives to cooperate with the Company, outside legal counsel, outside auditors, or other similar parties. The Company views failure to cooperate in an internal review as a breach of your obligations to the Company, and will deal with this failure severely in accordance with internal Company policies and any local laws or regulations.

10. Questions About the Policy.

If you have any questions relating to this Policy, please contact the Compliance Officer or the Associate General Counsel.

11. Reporting Policy Violations.

To report potential violations of this Policy, immediately notify your Supervisor, the Compliance Officer, the Associate General Counsel or reports can be made anonymously as follows:

a) Toll-Free Telephone:

English speaking (U.S. and Canada):	(844) 860-0008
Spanish speaking (U.S. and Canada):	(800) 216-1288
French speaking (Canada):	(855) 725-0002
Spanish speaking (Mexico):	01-800-681-5340
All Other Countries:	(800)-603-2869*

*Must dial country access code first

b) Web Reporting: www.lighthouseservices.com/orasure

c) E-mail: reports@lighthouse-services.com (Must include the Company name with report)

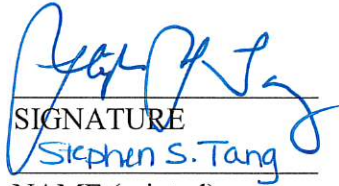
d) Facsimile: (215) 689-3885 (Must include the Company name with report)

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Foreign Corrupt Practices Act and Anti-Corruption Policy Certification

I have received and read a copy of the OraSure Technologies, Inc. Foreign Corrupt Practices Act and Anti-Corruption Policy and understand its contents. I understand that OraSure Technologies, Inc. expressly reserves the right to change, modify, or delete its provisions without notice.

Further, I understand that my employment is voluntarily entered into, that I am free to resign at any time and that OraSure Technologies, Inc. may terminate the employment relationship whenever it so determines with or without notice or cause. I am employed at will, and this Policy does not modify my at will employment status.


SIGNATURE

Stephen S. Tang
NAME (printed)

11/12/18
DATE